

Federal Defenders
OF NEW YORK, INC.

Tamara Giwa
Executive Director

USDC SDNY
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September 3, 2024

Via CM/ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Karrem Nasr*
24 Cr. 19 (AT)

Dear Judge Torres,

We write on behalf of the parties to provide a status update in the above-captioned case. The defense expects to receive a written report from its retained expert this week, which the defense intends to disclose to the Government shortly thereafter in furtherance of plea negotiations. To allow the parties adequate time to pursue those negotiations and potentially avoid unnecessary motion practice, the defense respectfully requests that the Court set a control date of November 3, 2024, for a subsequent status update, and adjourn the defense's *ex parte* CIPA 2 conference (currently scheduled for September 23, 2024) by 60 days. The Government does not object to this application.

In its August 5, 2024, Order, the Court also directed the parties to inform the Court about any anticipated motion practice. In the event the parties are unable to reach a negotiated pre-trial disposition, the defense may seek to file Fed. R. Crim. P. 12 motions, including motions under Rule 12(b)(3)(C) and 12(b)(3)(E). Given the ongoing nature of plea negotiations, however, the defense respectfully requests that the Court postpone any motions-related scheduling until the proposed November 3, 2024, status update. Should the parties fail to arrive at a pre-trial disposition, the defense expects to seek an adjournment of the January 6, 2025, trial date and will also propose potential dates to the Government and the Court no later than November 3, 2024.

Lastly, since the parties' last status update to the Court, the Government provided the defense with a set of identified materials seized pursuant to search warrants executed on Mr. Nasr's electronic accounts and devices. To the extent any other potential discovery is identified, the Government will promptly supplement its productions.

We thank the Court for its consideration of this application.

Respectfully submitted,

/s/

Andrew John Dalack, Esq.

Neil P. Kelly, Esq.

Assistant Federal Defenders

Cc: Counsel of Record

Counsel for Karrem Nasr

GRANTED. By **November 4, 2024**, the parties shall file a joint status update. The September 23, 2024 CIPA Section 2 conference is ADJOURNED to **December 2, 2024, at 1:00 p.m.**

SO ORDERED.

Dated: September 4, 2024

New York, New York



ANALISA TORRES
United States District Judge